



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 29, 2016

KEVIN BROGHAMER, TREASURER
REINVENTING A NEW DIRECTION POLITICAL
ACTION COMMITTEE
P.O. BOX 72598
NEWPORT, KY 41072

Response Due Date
04/04/2016

IDENTIFICATION NUMBER: C00493924

REFERENCE: YEAR-END REPORT (07/01/2015 - 12/31/2015)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

1. Schedule D discloses debt payments to "Paramount Communication, Inc." that are greater than disbursements itemized on Schedule(s) B. Please amend your report to clarify this discrepancy. (52 U.S.C. §30104(b)(5)(D) and (b)(8) (formerly 2 U.S.C. § 434(b)(5)(D) and (b)(8)))

- Schedule B discloses an expenditure(s) for "Media Production." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee

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will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1133.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Morse", written in a cursive style.

Christopher Morse
Senior Campaign Finance Analyst
Reports Analysis Division